

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Vincent Robert Roney	:	Case No. 18-10579-TPA
	:	
Debtor(s)	:	Chapter 13
	:	
Nationstar Mortgage LLC as Servicer for:	:	
Lakeview Loan Servicing, LLC	:	
Movant(s)	:	Related to Document 72
	:	
vs.	:	Hearing Date: 11/9/22 at 10:00 a.m.
	:	
Vincent Robert Roney	:	
Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY AS TO PROPERTY LOCATED  
AT 5000 EAST AVENUE, MCKEAN, PA 16426

Ronda J. Winnecour, Chapter 13 Standing Trustee, respectfully represents the following:

1. Nationstar Mortgage LLC, as Servicer for Lakeview Loan Servicing, LLC requests relief from stay with regard to the property located at 5000 East Avenue, McKean, PA 16426.
2. Movant claims post-petition payments which it is due are delinquent in the amount of \$1,801.58.
3. On April 21, 2022, Trustee had to void voucher check #1219673 to Lakeview Loan Servicing as stale-dated and attempted to re-issue manual check at check #1230080.
4. As of August 22, 2022, when Trustee was informed that the loan was service released to Nationstar from Rightpath Servicing, no transfer of claim had been filed by movant.
5. On August 23, 2022, Trustee filed two Notice of Funds on Reserve (Doc.

65 and Doc. 66), stating that no transfer of claim has been filed and that no further payments will be issued on this debt until a proof of assignment or notice of transfer of the claim is filed with the Clerk of the Bankruptcy Court and served on the Trustee.

6. On September 21, 2022, Movant filed a transfer of claim (Doc. 68), and subsequent Claim Status Correction (Doc. 70). Correspondence attached to the filed transfer of claims reveals that the transfer of claim had been in effect on June 8, 2022.

7. The certificate of mailing of the transfer of claim was filed on September 23, 2022.

8. Whereas movant filed this Motion for Relief from Stay on September 26, 2022 (Doc. 72), there has not been adequate time for Trustee to disburse funds to Movant in accordance with standard office procedures.

9. Debtor has been making monthly plan payments to Trustee, and as of September 26, 2022 payments were current, and in fact were ahead in the amount of \$1,143.62.

10. As of the date of this response, Trustee has distributed to Movant post-petition payments totaling \$42,663.89, which payments are current. Trustee has also distributed to Movant \$5,233.51 toward prepetition arrears.

WHEREFORE, the Trustee so reports to the court.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: September 28, 2022

By: /s/ James C. Warmbrodt  
James C. Warmbrodt, PA I.D. 42524  
Attorney for Chapter 13 Trustee  
US Steel Tower, Suite 3250  
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CERTIFICATE OF SERVICE

I hereby certify that on the 28<sup>th</sup> of September 2022, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh, PA 15222

Vincent Robert Roney  
5000 East Avenue  
McKean, PA 16426

Daniel P. Foster, Esquire  
Foster Law Offices  
1210 Park Avenue  
Meadville, PA 16335

Christopher A. DeNardo, Esquire  
LOGS Legal Group, LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406

/s/Rosa M. Richard  
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